

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Plaintiffs/Intervenors.

**PLAINTIFFS' RESPONSE TO DEFENDANT FDEM'S
EXPEDITED MOTION FOR LIMITED RECIPROCAL DISCOVERY**

Plaintiffs Friends of the Everglades and Center for Biological Diversity ("Plaintiffs"), through undersigned counsel, hereby respond to Defendant Kevin Guthrie's ("Defendant" or "FDEM") Expedited Motion for Limited Reciprocal Discovery filed on July 29, 2025 (D.E. 69).

Plaintiffs have responded to Defendant FDEM's July 29, 2025, First Set of Requests for Production of Documents (see Exhibit 1) and produced documents, including on Friday, August 1, and Sunday, August 3. Plaintiffs objected to the requests to the extent they are vague, ambiguous, and overly broad but nevertheless have made available documents in their possession that are responsive to the requests.

Dated: August 4, 2025

Respectfully submitted,

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Counsel for Center for Biological Diversity

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 4, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

Service List	
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<p>GERALDINE BONZON-KEENAN Miami-Dade County Attorney Christopher J. Wahl Assistant County Attorney wahl@miamidade.gov Monica Rizo Perez Assistant County Attorney rizo@miamidade.gov David M. Murry Assistant County Attorney DMMurray@FlyMIA.com Stephen P. Clark County 111 Northwest 1st Street, Suite 2810 Miami, Florida 33128 Telephone: (305) 375-5151 Victor.Rodriguez3@miamidade.gov Madalis.Gonzalez@miamidade.gov KGriffin@FlyMIA.com</p> <p><i>Counsel for Miami-Dade County</i></p>	<p>Todd R. Friedman, Esq. todd@toddfriedmanpa.com TODD R. FRIEDMAN, P.A. 1101 Brickell Avenue Suite S-700 Miami, Florida 33131 Telephone: (786) 536-7190</p> <p><i>Counsel for The Miccosukee Tribe of Indians</i></p>